

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

Cr. No. 19-cr-142-01-LM

NATHAN CRAIGUE

DEFENDANT'S PROPOSED VOIR DIRE

Pursuant to Rule 24 of the Federal Rules of Criminal Procedure, counsel for Mr. Craigue respectfully requests that the Court ask prospective jurors the following questions:

Questions about the Defendant

1. Mr. Craigue is a lifelong resident of Concord, who was drafted to play professional baseball out of Concord High School. Do you know Mr. Craigue or familiar with his baseball career?
2. Having heard the charge and case summary, are you familiar with this case or learned about it from any media source?

Offense Specific

1. Have you ever owned your own business or run a business?
 - a. If so, did you hire employees or subcontractors?
 - b. Do you feel that you would be unable to be a fair and impartial juror in a case in which the defendant is charged by the government with a crime substantially related to the running of his business?
 - c. Do you feel that your experience as a business owner would make you unable to be a fair and impartial juror in a case where you must determine whether a worker is an employee or a subcontractor?
2. Do you work in the area of human resources? Does your job entail the hiring of workers and processing employment paperwork?
 - a. Do you feel that your job would make you unable to be a fair and impartial juror in a case where you must determine whether a worker is an employee or a subcontractor?
3. Have you or a close friend or family member worked in construction or home improvement?
4. Do you have any specialized training or knowledge in the area of employment law or business law and/or administration?

5. Do you belong to or support any political or social organizations that advocate for government oversight of the workplace?
6. Have you ever hired a contractor to do home improvements? Did that experience cause you to form any positive or negative opinions that would make you unable to be fair and impartial in this case?
7. Do you hold any general opinions or beliefs about home improvement contractors that would make you unable to be fair and impartial in this case?
8. In this case you will be required to decide if the government has proved beyond a reasonable doubt that a worker was in fact an employee rather than a subcontractor. Does anything about that requirement cause you concern or make you feel unable to be a fair and impartial juror?
9. Do you believe that federal agents are more trustworthy than the average person?
10. Do you think law enforcement officers are more trustworthy than the average person?
11. Have you ever had any negative interactions with attorneys that would make you unable to be fair and impartial in this case?

Questions about Coronavirus

1. Do you have any medical diagnoses which you believe puts you in a high risk category for contracting or experiencing death from COVID-19?
2. Do you live with anyone that is in a high risk category of contracting or experiencing death from COVID-19?
3. Would you feel pressure to reach a verdict quickly to avoid exposure to COVID-19?
4. Would you be distracted during the evidence by a fear of contracting COVID-19?
5. Would you change your verdict to agree with others, or compromise with other jurors, in order to end deliberations faster so you could leave the courthouse sooner?
6. Do you have children? If so, do you have arrangements for child care for the entirety of the expected length of trial?

Respectfully submitted,

Date: October 29, 2020

/s/ Dorothy E. Graham

Respectfully submitted,

Dorothy E. Graham
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CERTIFICATE OF SERVICE

I hereby certify that the above document was served on the following person on October 29, 2020 and in the manner specified herein: electronically served through CM/ECF to AUSA John Davis and AUSA Anna Dronzek.

/s/Dorothy E. Graham

Dorothy E. Graham